

CRAWFORD STREET CORPORATION

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NO. Pate.

Mr. Tom Gainer
Oregon Department of Environmental Quality
2020 SW Fourth Ave., Suite 400
Portland, OR 97201

Re: Crawford Street Corporation, 8424, 8524 N. Crawford St. Portland, OR

Dear Tom,

I am responding to your letter to me of February 21, 2001. We are prepared and planning to go ahead with the investigative work as set forth in our January 26, 2001 Sampling and Analysis Plan (SAP), with minor revisions detailed below. However, we would like to clear up some confusion that appears to be raised in your letter to me.

As you know, Crawford continues to believe it is not legally responsible for conditions potentially caused or associated with past owners or operators of the site. Consistent with this belief, we submitted a SAP on June 14, 2000 that assessed whether the activities for which we may be responsible could be resulting in releases of hazardous substances to the Willamette River. In response, you issued a July 24, 2000 letter, which disagreed with our position and requested specific, significant additions and modifications to the SAP.

Crawford's views regarding responsibility for conditions potentially caused or associated with past owners or operators of the site have not changed. However, we agreed during our meeting with you on January 23, 2001 to do the additional work you requested to avoid a confrontation on the legal issues and to avoid the inefficiencies of dual investigations. At that meeting, which was attended by yourself and other DEQ staff, including Eric Blischke, Lynne Perry, Mike Rosen, and Neil Mullane, we made it very clear that we were trying to be cooperative in agreeing to do what you asked, even if we disagreed with your basis for requesting the additional work. In turn, we understood DEQ to indicate that, if the data from the requested work were found to be below applicable levels of concern, we would be eligible for an NFA determination. We therefore prepared a revised SAP that included all of the additional work that you requested in your July 24, 2000, letter.

The first paragraph of your February 21, 2001, letter is consistent with that understanding. In particular, you state in this paragraph "...as discussed during our meeting on January 23, 2001, the Oregon Department of Environmental Quality (DEQ) appreciates the revisions made to the SAP to determine whether a current source and pathway for Willamette River contamination exists at the Crawford Street Site."

Your letter then makes an additional nine comments or suggestions to the revised SAP, beyond what was discussed at the meeting. We have carefully considered each of your comments and concur that the corrections and suggestions offered in your comments 5, 7, and 8 are appropriate. In particular:

- For explorations PP-1, PP-2, and PP-3 the default sample depth for analysis if no field evidence is observed will be at the soil/groundwater interface.

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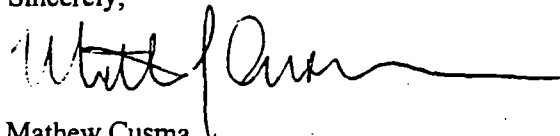
- Based on discussions with local drillers familiar with the anticipated conditions at the site, we are planning on using *Direct Push GeoProbe Wells* to obtain groundwater samples at the three pushprobe exploration locations. These explorations consist of a standard (i.e. 2 1/8-inch diameter) GeoProbe push probe hole down which will be installed a 3/4-inch diameter pre-packed screen and riser pipe. A 10-foot screen length will be used. After the screen is installed and the probe rods are pulled back, the annulus around the screen will be backfilled with a graded sand. A temporary flush-mount monument will be placed over the top of the well. The driller will obtain a start card and a readily available variance prior to installing the well. The well will be developed by removing water with a rig-mounted vacuum pump. Groundwater samples for PAHs and metals will be obtained using the vacuum pump. Groundwater samples for VOC analysis will be obtained using either a small-diameter bailer or siphoning methods. Notwithstanding this approach and DEQ's belief that representative groundwater samples can be collected without using standard monitoring wells, we continue to have concerns regarding the practicability of collecting sufficient volumes of non-turbid groundwater samples without the installation of more costly monitoring wells.
- We will compare the measured groundwater concentrations and the soil concentrations along the river shoreline with DEQ's ecological benchmark values. Given the lack of ecological receptors in the Columbia Forge yard and along the railroad tracks, it is not appropriate to compare the measured contaminant concentrations in the soil samples from these areas with the ecological benchmark values.

We do not intend to implement the remaining suggestions. These suggestions reflect an increase in the list of analytes over and above what we already reluctantly agreed to perform in our January 23rd meeting.

I trust this clarifies the sampling and analysis program we intend to perform at the Crawford Street site. We are currently scheduled to start the field work as described above and in the SAP on April 10, 2001. Based on typical laboratory turnaround times, laboratory results should be available by the end of April.

Please call if you have any questions.

Sincerely,



Mathew Cusma
Environmental Administrator
(503) 286-6944

cc: Eric Blischke
Mike Rosen
Lynne Perry
Neil Mullane